

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RINA OH n/k/a RINA OH AMEN,

Case No.: 21-cv-8839

Plaintiff,

-against-

**NOTICE OF MOTION  
ORAL ARGUMENT  
REQUESTED**

VIRGINIA L. GIUFFRE

Defendant.

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**PLEASE TAKE NOTICE**, that upon the accompanying Declaration of Kathleen R. Thomas, Esq., sworn to on the 18<sup>th</sup> day of February 2025, the exhibits annexed thereto, the Local Civil Rule 56.1 Omnibus Statement of Material Facts, and the Memorandum of Law in support of the defendant VIRGINIA L. GIUFFRE's Motion for Summary Judgment dated February 18, 2025, and upon all the pleading and proceedings heretofore had herein, the undersigned will move this Court at the United States District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007, before the Honorable Naomi Reice Buchwald, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure for Summary Judgment on the grounds that it fails to state a claim upon which relief may be granted and granting such other and further relief as to this Court seems just and proper under the circumstances.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the December 18, 2024, Order of the Honorable Naomi Reice Buchwald, opposition papers, if any are to be filed on or before March 21, 2025. Reply submissions are to be filed before April 14, 2025.

Dated: New York, NY  
February 18, 2025

Yours, etc.,

THOMAS COUNSELORS AT LAW, LLC

By: \_\_\_\_\_/s/\_\_\_\_\_  
Kathleen R. Thomas, Esq.  
*Attorney for Defendant Virginia Giuffre*  
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STARK & STARK

By: \_\_\_\_\_/s/\_\_\_\_\_  
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